

10/03/2006

SDMS Document ID



1057082



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10/03/2006 12:32 PM

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Subject Asarco East Helena Plant - Lower Lake Analytical Results

Scott - Last week, we spoke about the outstanding requirements set forth in the CERCLA Process Ponds ROD, with particular emphasis on the lower lake ROD limits. As I explained, Asarco continues to collect lower lake water quality as part of the long-term RI/FS monitoring program. The results of this sampling effort along with the lower lake ROD limits have been summarized and presented in the attached tables and graphs. Note that the y-axis on the graphs (concentration) is logarithmic. The East Helena high density sludge (HDS) water treatment plant discharges treated water directly to lower lake under authorization of the MPDES process. I have also illustrated the MPDES discharge limits for the five ROD metals (based on 90 gpm discharge rate) for the HDS water treatment plant in the attached graphs. Four of the five ROD metal limits are more stringent than the MPDES limits. The only exception to this rule is lead, which is 0.003 mg/L at a 90 gpm discharge rate. The data and graphs suggest a steady decline in metal concentrations in lower lake. While the HDS water treatment effluent continues to meet all metal MPDES limits, arsenic, cadmium, copper, and zinc concentrations within lower lake also consistently meet MPDES limits. Asarco looks forward to further discussing the possibility of integrating remaining CERCLA ROD requirements with the RCRA Consent Decree.

<<LowerLake_graphs.xls>>

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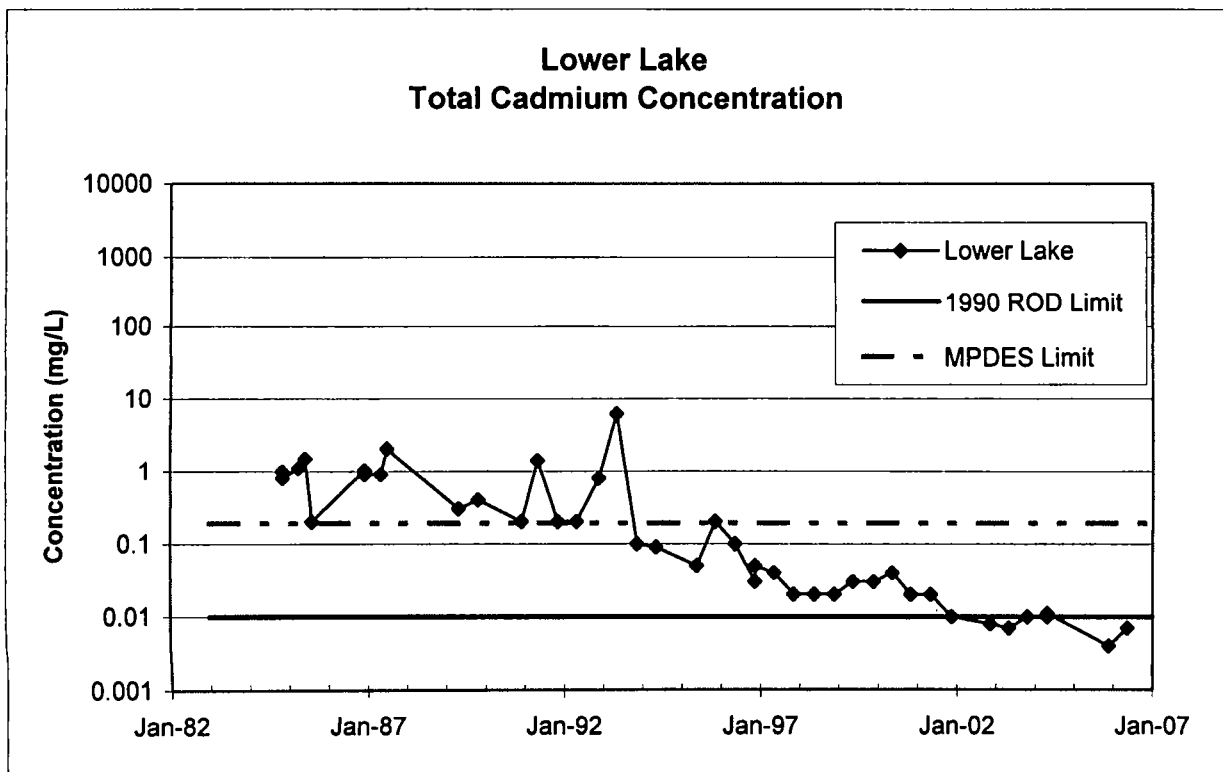
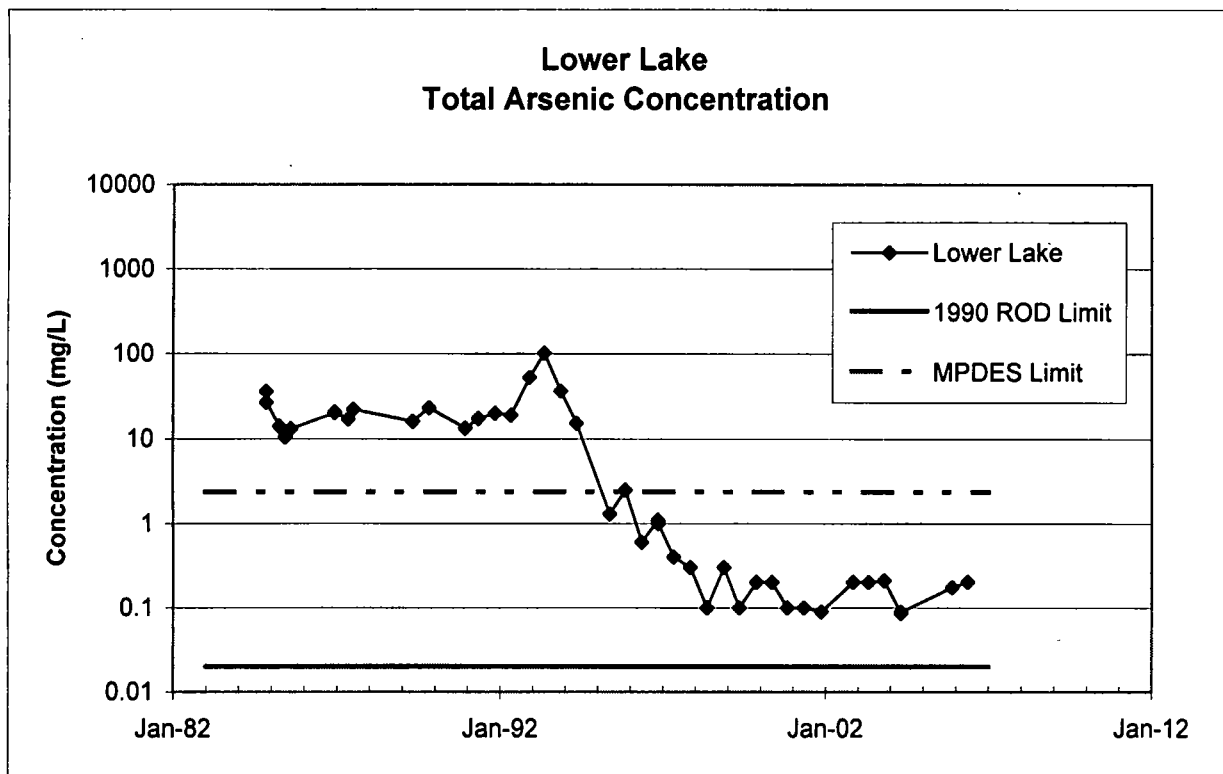
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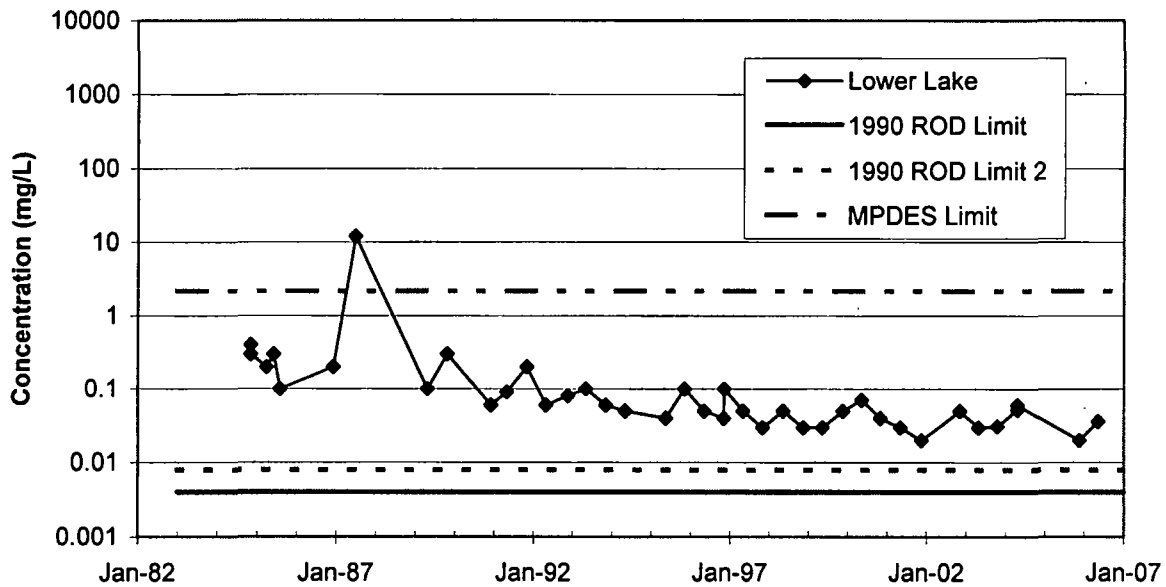


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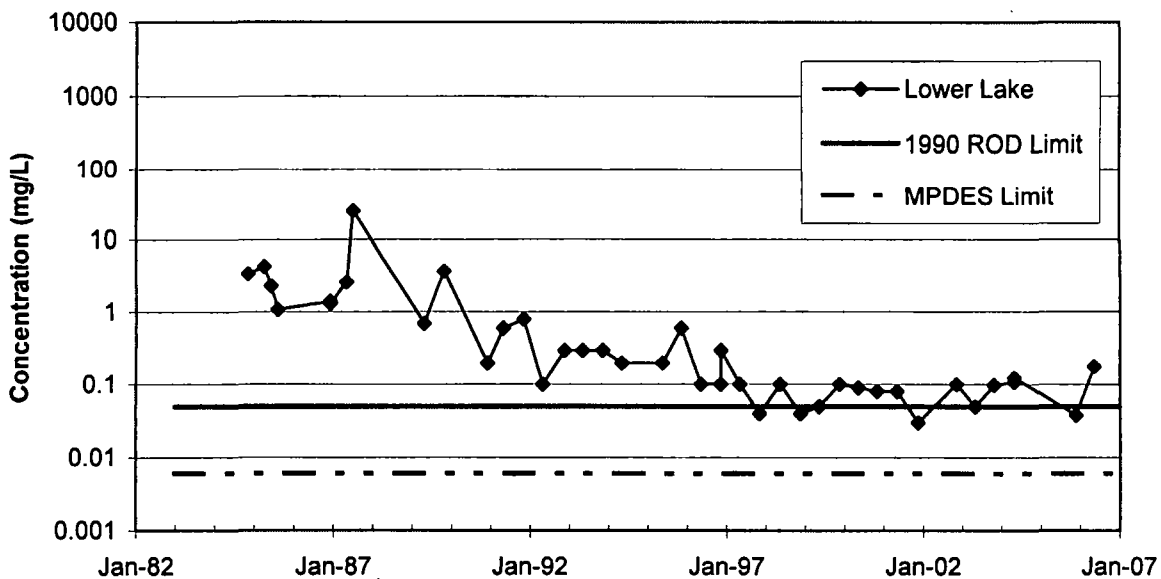


Note: MPDES limits are based on a flow rate of 90 gpm.

Lower Lake Total Copper Concentration



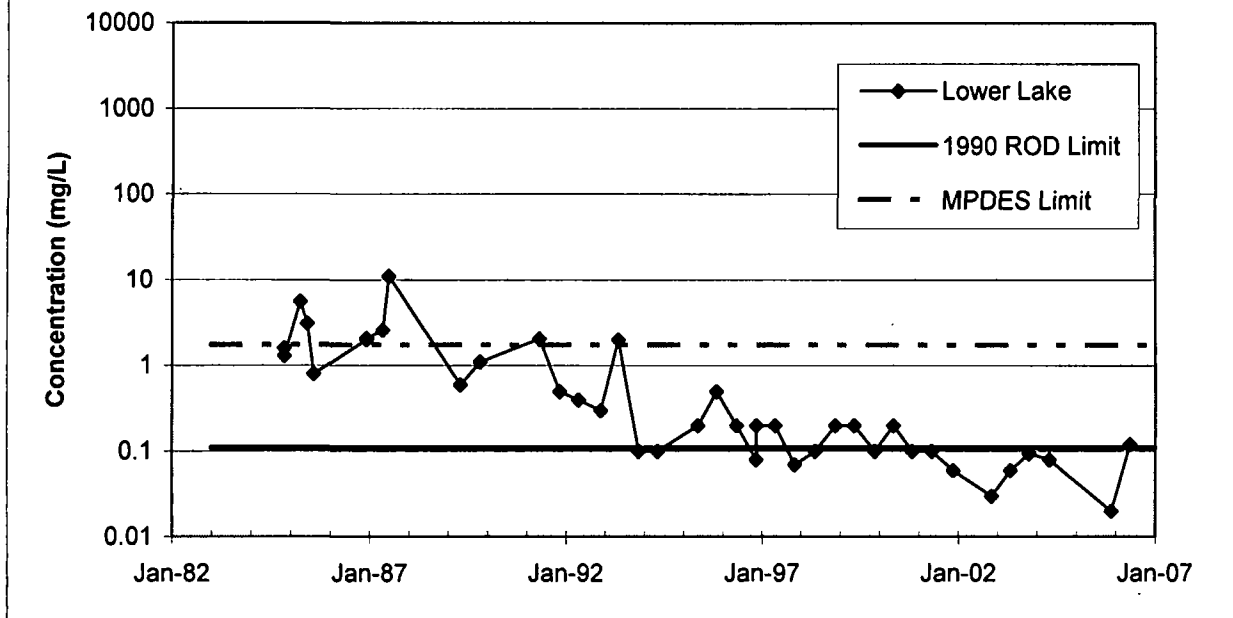
Lower Lake Total Lead Concentration



Lower Lake Total Zinc Concentration

Note: MPDES limits are based on a flow rate of 90 gpm.

Total Zinc Concentration



Note: MPDES limits are based on a flow rate of 90 gpm.